

UTAH STATEWIDE IMMUNIZATION INFORMATION SYSTEM

CONFIDENTIALITY AND SECURITY POLICIES

Version 1.1



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**The USIIS Program
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INTRODUCTION

Utah Statewide Immunization Information System (USIIS) is a computer based immunization registry and tracking system implemented by the Utah Department of Health and its partners. It establishes an information system to coordinate immunizations among health care providers to assure adequate immunization and to avoid unnecessary immunizations. The USIIS confidentiality and security policy provides for the sharing of immunization information among authorized health care providers, health insurers, schools, day care centers, and publicly funded programs to meet statutory immunization requirements and to control disease outbreaks.

Participation in the USIIS network is voluntary. USIIS is developed under the authority of the following provisions of the Utah Code: Title 26, Chapter 3, Health Statistics; Title 26, Chapter 6, Communicable Diseases Control Act, Section 26-1-17.5, Title 53A, Chapter 11, Part 3, Immunization of Students, and Utah Administrative Rule 380-800 Immunization Coordination.

USIIS shall protect the privacy of registry participants and the confidentiality of information contained in registries. Patient or provider specific information in USIIS is only available to the authorized users and the Utah Department of Health (UDOH).

SECTION I: PATIENT CONSENT

The Utah Administrative Rule (R380-800) Immunization Coordination became effective as of July 14, 2000. This rule establishes a requirement allowing individuals to withdraw from the USIIS system.

I. Voluntary Participation

Individual participation in the immunization coordination system is voluntary. The immunization records of all children, who are 0 to 18 years of age, a resident of Utah, or a participant of Utah publicly funded program, may be included in the system unless the individual or parent or guardian withdraws.

An individual, parent, or guardian who has given prior affirmative consent at hospitals, birthing centers, and public health clinics to participate in the system will be included until such time as he or she withdraws from the system.

Utah Code (26-3-7(6)) permits that under specific circumstances, individually identifiable immunization information may be released to "health care personnel or public health personnel who has a legitimate need to have access to the information in order to assist the patient or to protect the health of others closely associated with the patient".

II. Notification

The UDOH will provide the information on the use of USIIS directly to parents or guardians at birth hospitals and birthing centers. UDOH will also provide USIIS

enrollment notification poster and educational materials to the USIIS organizational participants for them to display in clinics.

Organizations that participate in the system shall cooperate with UDOH in providing information about the right to withdraw from the system as required in the participation agreement.

III. Withdrawal

An individual or his or her parent or guardian may withdraw their participation from the system at any time. The UDOH shall provide withdrawal forms and contact information to individuals and parents or guardians.

The USIIS withdrawal form is published at the USIIS Web Site for download. The URL address is:

www.usiis.org

Any individual, parent, or guardian can call the USIIS Help Line (801-538-6872) or Immunization Hot Line (1-800-275-0659) to request a withdrawal form. The withdrawal form with parent's or guardian's signature must be faxed to USIIS at 801-538-6510 or mailed to:

The USIIS Program
Utah Department of Health
P.O. Box 142001
Salt Lake City, Utah 84114-2001

The withdrawal contact information will be published in the USIIS parent brochures, notification posters, and educational materials.

IV. Re-enrollment

If a parent or guardian has withdrawn consent but later wants to enroll their child in USIIS, he or she can re-enroll a child anytime by contacting USIIS at the above phone/fax number, or mailing address.

V. Adult Patient Consent

The requirements in Item I – IV of this section are applying for children from 0 to 18 years of age only. Written consent must be obtained from adult patients who are 18 years of age or older, before entering an adult's immunization information into the USIIS system.

Consent language must include the following statement but not limited to:

"I agree that __Patient's Name__ immunization information may be shared with health care professionals as necessary to verify immunization status and public health studies."

Only one consent needs to be obtained from an adult patient to enroll in USIIS. This consent is valid until it is revoked in writing.

Adult patients can withdraw from the registry at any time by calling the Utah Department of Health at 801-538-9452 to request a withdrawal form, filling in and signing the form, and sending it to 801-538-6510 (fax), or mailing it to:

USIIS program
Utah Department of Health
P.O. Box 142001
Salt Lake City, Utah 84114-2001.

Adult patients can re-enroll in USIIS anytime through signing a consent with a USIIS organizational participant.

When an organizational participant reports adult immunization data to USIIS through an electronic data interchange, the participant shall give USIIS the demographic and immunization information about adult patients for whom consent has been obtained. If additional non-demographic and non-immunization information is included, the Provider shall instruct USIIS to destroy it.

SECTION II: USE OF THE DATA AND CLASSIFICATION OF THE USERS

Only authorized users shall use the information in USIIS for authorized purposes. Health care providers, health insurers, schools, day care centers, and publicly funded programs can apply to participate in the system. An authorized organizational participant must sign a participation agreement and abide by its requirements. No person or individual is required to access the system to coordinate immunizations.

Organizational participants may access identifiable patient information in the system only as required to assure adequate immunization of a patient, to avoid unnecessary immunizations, to confirm compliance with mandatory immunization requirements, and to control disease outbreaks.

Providers, including health care personnel and public health personnel, are the USIIS primary users. Providers agree to use USIIS only for the immunization needs of its patients or the targeted population in a clinic's catchment area. Provider and its personnel will access the registry system only when needed to coordinate immunization services. Health plans, policy makers, and bona fide researchers may request access to the USIIS information for a specified period, solely for bona fide research and statistical purpose, determined in accordance with department rules (Utah Codes 26-3-7(3)).

Schools and day care centers are the secondary users of USIIS. Specific policies will be established to allow the secondary users to get access to the information.

Parents can query their own child's immunization information contained in USIIS through their own health care provider if the provider participates in USIIS and/or through a school nurse or day care personnel after the beginning of the USIIS Phase II. Authorized providers, school, and day care personnel shall allow the parent or guardian

to inspect, copy, and if necessary, amend or correct their own children's immunization records if he/she demonstrates that record is incorrect by a credible source.

All other access is restricted by Title 26, Chapter 6, Communicable Disease Control, and Title 26, Chapter 3, Health Statistics.

SECTION III: LIABILITY

Organizational participants report immunization records to the system under the authority of the Communicable Disease Control Act. An organizational participant who reports information in good faith pursuant to the R386-800, Immunization Coordination Rule, are not liable for reporting the immunization information to the Department of Health for use in the system.

SECTION IV: DATA ACCESS AND SECURITY PROCEDURE

Provider is responsible for the actions of its staff regarding the confidentiality of information contained in USIIS. Provider shall require each staff user to sign a USIIS confidentiality agreement and keep it on file. The official USIIS form will be used.

Any person who violates any provision of the USIIS Confidentiality and Security Policy may be assessed a civil money penalty not to exceed the sum of \$5,000 or be punished for violation of a class B misdemeanor for the first violation and for any subsequent similar violation within two years for violation of a class A misdemeanor (Utah Administrative Rule R386-800-8).

I. Security Procedures

1. All users shall safeguard his/her user ID and password.
 - Do NOT give a user ID and password to others
 - Do NOT post a user ID and password on any place
 - Change a password periodically
2. The USIIS program shall maintain reasonable and appropriate administrative, technical, and physical safeguards to ensure the integrity and confidentiality of health information.
 - The USIIS central database (UNIX AIX/RS6000) resides in a secured area.
 - UDOH shall establish the firewall protection of its computing network to prevent access by hackers.
 - USIIS uses data encryption technology in its Internet application.
 - USIIS shall provide periodical training on privacy and data security to its staff and users.
 - USIIS shall conduct periodical assessment on the implementation of its privacy and security policies.

REFERENCES

CDC (Gail Horlick). 1997, 1999, 2000. Community Immunization Registries Manual: Chapter II, Confidentiality. Prepared by All Kids Count Program of the Task Force for Child Survival and Development, The National Immunization Program of the Centers for Disease Control and Prevention, The national Vaccine Advisory Committee.

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Michael L. Popovich, 1996. Immunization Information System: Privacy and Data Security Concepts. White Paper. Scientific Technologies Corporation, Tucson, Arizona.

Scientific Technologies Corporation. 1996. Arizona State Immunization Information System: Privacy and Data Security Plan. The Arizona Department of Health Services, Epidemiology and Disease Control, Immunization Program Office